# Proposed REP Program Changes State of Ohio



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### Challenges and Lessons-Learned from Hostile Action-Based EP Drills

- Ohio has participated in one hostile action-based drill 9/12/2007 with PNPP
- Protective action recommendations and decisions require new considerations
- ICS integration into REP Planning particularly protective action decisions





### Challenges and Lessons-Learned from Hostile Action-Based EP Drills

- First Responders are now engaged on-site rather than with traditional off-site REP duties
- Many state and local personnel gravitated toward standard REP exercise concerns
- Development of planning standards must accompany changes to exercise requirements





#### Spectrum of Exercise Scenarios

- Varying exercise scenarios are needed to avoid a programmed response – minimize predictability
- Current exercise guidelines do not allow the scenarios to be varied sufficiently
- A spectrum of scenarios will promote realistic discussions regarding actions to be taken, rather than an automatic completion of default actions
- Exercise scenarios should cover less severe accident scenarios (no release) as well as the very improbable most severe cases



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#### Spectrum of Exercise Scenarios

- Excessive out-of-sequence activities or activities driven by controller injects should be avoided
- Probability, possibility, and realism
- A balance must be achieved with respect to the responsibility to exercise all aspects of the response, realism, and predictability



#### Improving Coordination

- Improve REP program guidance to ensure requirements are clear and applied uniformly across FEMA regions and through the NRC to licensees.
- NRC / FEMA alignment on exercise issues is paramount
- Increased federal participation during exercises would be beneficial
- Ensure the integration of REP with more recent FEMA initiatives





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